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February 28, 2025

Via ECF

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 4H North
Brooklyn, New York 11201

Re: Campbell v. Solar Mosaic, LLC, et al.
Case No. 24-cv-06208-LDH-VMS

Dear Judge DeArcy Hall,

This firm represents Defendants, SUNco Capital, LLC, ATTYX Utah LLC, and ATTYX LLC (collectively, “SUNco”), in the above-referenced action. We write, jointly with the undersigned counsel for Plaintiff, Claver Campbell, and for Defendants, Solar Mosaic LLC and WebBank (collectively, “Mosaic”), to inform the Court of the status of settlement discussions.

The parties have met and conferred regarding settlement several times, both remotely and by letter. Mosaic and SUNco’s counsels believe those discussions were unsuccessful and that the parties remain far apart in their respective settlement positions. Therefore, we respectfully request that the Court set a briefing schedule on SUNco’s motion to dismiss and/or compel arbitration and Mosaic’s motion to compel arbitration.

Plaintiff’s counsel believes that there is still opportunity to settle the case given that Plaintiff has only made two offers to Defendants (on December 30, 2024 and February 20, 2025) with Defendants failing to respond to the second offer. As Your Honor had offered during the December 17, 2024 court conference, Plaintiff’s counsel believes that the assistance of Magistrate Judge Scanlon in settlement discussions could prove fruitful. Therefore, Plaintiff’s counsel respectfully requests that the Court recommend that Judge Scanlon assist with settlement discussions.

It is Defendants’ position that Plaintiff’s second offer was at least the same as, if not higher than, her first offer and, regardless, the parties are so far apart that the Magistrate’s assistance

would be futile at this point. Therefore, Defendants object to Plaintiff's request. Plaintiff disagrees with Defendants' interpretation of Plaintiff's second offer.

Thank you for your attention to this matter.

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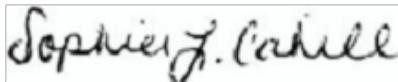
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